

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MNG, LLC, a Washington Limited Liability  
Company; PHILMON NEGUSSE, an  
individual; and HENOK ABRAHA, an  
individual,

Plaintiffs,

v.

MERRICK GARLAND, U.S. Attorney  
General, U.S. Department of Justice; JAY  
INSLEE, Governor of the State of Washington;  
LIQUOR AND CANNABIS BOARD OF THE  
STATE OF WASHINGTON; DAVID  
POSTMAN, Chair of the Liquor and Cannabis  
Board; RICK GARZA, Director of the Liquor  
and Cannabis Board,

Defendants.

Case No. 2:21-cv-1038-BJR

STIPULATION AND ORDER OF  
DISMISSAL OF ALL CLAIMS AGAINST  
REMAINING DEFENDANTS WITHOUT  
PREJUDICE

**JOINT STIPULATION**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs MNG, LLC,  
PHILMON NEGUSSE, and HENOK ABRAHA; and the Defendants U.S. Department of Justice, U.S.  
Attorney General Merrick Garland, in his official capacity, Governor Jay Inslee, Washington State  
Liquor and Cannabis Board, Chair David Postman, and Director Rick Garza, acting by and through

STIPULATION AND ORDER OF DISMISSAL [Case No.  
2:21-cv-1038-BJR] - 1

**Halverson Law, PLLC**  
Attorneys at Law  
19655 First Ave South, #106  
Normandy Park, WA 98148  
Phone: 206-489-2712 Fax 206-212-4154

their respective counsel, under Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the above-titled action as to all claims and all remaining Defendants shall be dismissed without prejudice and without costs to any of the parties.<sup>1</sup>

**SO STIPULATED.**

DATED this 5<sup>th</sup> day of January, 2022.

Respectfully and jointly submitted,

/s/ Erik L. Halverson

Erik L. Halverson, WSBA #48511  
Attorney at Law  
HALVERSON LAW, PLLC  
19655 First Avenue South, Suite 106  
Normandy Park, Washington 98148  
Phone: 206-489-2712  
Email: erik@halversonlaw.com

*Attorneys for Plaintiffs MNG LLC, Philmon Negusse,  
and Henok Abraha*

TESSA M. GORMAN  
Acting United States Attorney

/s/ Kristen R. Vogel

KRISTEN R. VOGEL, NY No. 5195664  
Assistant United States Attorney  
Western District of Washington  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Email: kristen.vogel@usdoj.gov

*Attorney for Department of Justice and Attorney  
General Merrick Garland in his official capacity*

BRIAN M. BOYNTON  
Acting Assistant Attorney General  
Civil Division

C. SALVATORE D'ALESSIO, Jr.  
Acting Director

ANDREA W. MCCARTHY  
Senior Trial Counsel

/s/ Paul E. Werner

PAUL E. WERNER  
(Md. Bar, under LCR 83.1(c)(2))  
Senior Trial Counsel  
U.S. Department of Justice  
P.O. Box 7146  
Washington, DC 20044

<sup>1</sup> The claims against Attorney General Merrick Garland in his individual capacity were already dismissed with prejudice. See ECF No. 21. This stipulation does not address those claims.

Phone: 202-616-4152  
Email: Paul.Werner@usdoj.gov

*Attorneys for Attorney General Merrick  
Garland in his individual capacity*

BRUCE L. TURCOTT

/s/ Leah E. Harris

LEAH EDITH HARRIS

Attorney General's Office (Sea – Fifth Ave.)

800 5th Ave Ste 2000

Seattle, WA 98104-3188

206-389-2031

Email: Leah.Harris@atg.Wa.Gov

*Attorneys for Jay Inslee, David Postman, Rick Garza, and Liquor and Cannabis Board of the  
State of Washington*

**ORDER**

THIS MATTER having come before the undersigned judge of the above-entitled Court,  
based on the foregoing stipulation, now, therefore,

IT IS HEREBY ORDERED that this matter, including all remaining claims and all remaining  
Defendants, shall be dismissed from the above-entitled action without prejudice and without costs or  
interest to any party.

DATED this 5th day of January, 2022.



BARBARA J. ROTHSTEIN  
United States District Judge